## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

KAYLA REED, an individual, :

.

Plaintiff,

:

v. : Civil Action No. 17-0506

SUNGLASS HUT TRADING, LLC,

.

Defendant. : Judge Timothy S. Black

## <u>DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEFENDANT'S TIME TO</u> <u>RESPOND TO PLAINTIFF'S COMPLAINT</u>

Pursuant to Local Rule 7.3, Defendant Sunglass Hut Trading, LLC ("Defendant" or "Sunglass Hut"), with the consent of Plaintiff, Kayla Reed ("Plaintiff") (together, the "Parties") respectfully requests that the Court approve Defendant's Unopposed Motion to Extend Defendant's Time to Respond to Plaintiff's Complaint. Prior to submitting this Motion, Defendant conferred with Plaintiff and provided her with a copy of the Motion. Two previous extensions were granted by Unopposed Motion to Extend Defendant's Time to Respond to Plaintiff's Complaint and Supporting Memorandum (see ECF No. 6-7) on September 6, 2017, extending the original deadline of September 8 to September 29, 2017 and on September 26, 2017 extending the deadline of September 29 to October 13, 2017.

To further ongoing settlement discussions, the Parties have mutually agreed to an additional extension of one week for Sunglass Hut to move, answer or otherwise respond to Plaintiff's Complaint. The new deadline is October 20, 2017.

WHEREFORE, Sunglass Hut respectfully requests that the Court grant its Unopposed Motion and extend Sunglass Hut's time to move, answer, or otherwise respond to the Complaint to October 20, 2017.

Dated: October 13, 2017 Respectfully submitted,

s/ Andrew Barber

Andrew Barber (OH #0091160) MORGAN, LEWIS & BOCKIUS LLP One Oxford Centre, 32nd Floor 301 Grant Street

Pittsburgh, PA 15219 PH: 412.560.7449 FX: 412.560.7001

andrew.barber@morganlewis.com

Trial Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2017, I filed the foregoing document via the court's CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record identified below via Notice of Electronic Filing generated by CM/ECF.

Emily White
Marc E. Dann
Brian Flick
DANNLAW
PO Box 6031040
Cleveland, OH 44103
notices@dannlaw.com

Counsel for Plaintiff

s/ Andrew Barber
Andrew Barber